USC's Confirmation of Hao Li's and Pinscreen's Public Deception at ACM SIGGRAPH RTL 2017

http://sadeghi.com/USC-Confirmation-of-Hao-Li-and-Pinscreen-Public-Deception-at-SIGGRAPH-RTL-2017

The Office of Research at University of Southern California (USC) has been conducting an investigation of Hao Li's and Pinscreen's scientific misconduct since 2018. On December 9, 2019, USC's Research Integrity Officer, Dr. Kristen Grace, confirmed in writing that Pinscreen's demo at ACM SIGGRAPH Real-Time Live (RTL) 2017, lead by Hao Li, was "misrepresented" constituting "falsification" and "research misconduct" (Exhibit A):

Kristen Grace <gracekri@usc.edu> Mon, Dec 9, 2019 at 1:05 PM
To: Iman Sadeghi <sadeghi@gmail.com>

Thanks for the info. What I meant to ask relates to the claim that Pinscreen was pre-recording avatar creation in the event there were internet issues. The conference organizers indicated to him that it was acceptable to do IF there was a problem. This would mean that the full working code was available, but that code was not able to be implemented after running in real-time and having internet issues. At this point the decision would be made to used a cashed version instead. If this were the case, the presenter should explain this to the audience. According to you, the presenter, and the Skype conversations, there were no attempts to run a working code at SIGGRAPH RTL, one that actually does what you presented, but could not run effectively due to connectivity issues.

I'm just trying to counter Li's argument that it is acceptable to present a non-realtime presentation based on problems with connectivity. That argument is moot if there was no test at SIGGRAPH for any connectivity problems. Either way, the presentation itself was misrepresented with no explanation to the audience. As presentation of a newly researched and developed computer science technology, that in-and-of itself is falsification and research misconduct. Verifying from you the presenter that the https://gitlab.com/pinscreen/rtl-app.git was the only code available at the time and the one you presented to the audience is a key piece of information. Also that you, as presenter, knew and admit that Pinscreen was knowingly misleading the audience (under Li's direction) by not informing them that the presentation was manually created and pre-recorded and not a RT demo, as was introduced by the moderator, Li and you at the time.
Kristen

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On December 16, 2020, Benjamin Davidson, on behalf of Pinscreen and Li, authenticated the USC emails by confirming that the "same emails" were also produced by USC in response to a subpoena[1].

Hao Li has made contradicting representations to USC and during discovery and his employment at USC has terminated as of June 2020. On June 5, 2020, Dr. Kristen Grace confirmed that termination of Hao Li's employment from USC was not voluntary and that Hao Li "did not resign".

[1] http://sadeghi.com/Hao-Li-Authenticates-USC-Confirmation-of-Pinscreen-Public-Deception-at-SIGGRAPH-RTL-2017

Exhibit A:

USC's Confirmation of Li's and Pinscreen's Public Deception at SIGGRAPH RTL 2017

1. Sadeghi's allegations regarding Li's and Pinscreen's public deception during ACM's SIGGRAPH Real-Time Live ("RTL") [1] on August 1, 2017 in TAC ¶ 93:

> [TAC ¶ 93 (also SAC ¶ 93)]: "On August 9, 2017, two days after Sadeghi's termination, Sadeghi's counsel informed Pinscreen that Sadeghi may have a Labor Code §1102.5 whistleblower retaliation claim and a claim for wrongful termination in violation of public policy. Sadeghi's counsel demanded Pinscreen to preserve all relevant Electronically Stored Information ("ESI"), including the software codebase for Pinscreen's RTL demo, which was stored in a third-party repository called GitLab.[13]
>
> This version-controlled repository stores snapshots of the codebase as it existed at a specific time. Pinscreen's application that was executed during **SIGGRAPH RTL**, on August 1, 2017, can be retrieved using this repository.
>
> **No matter who uses this version of the application to generate their own avatar from a webcam—as Pinscreen demonstrated—the pre-built avatar of Sadeghi will be displayed every time.**"
>
> [13] https://gitlab.com/pinscreen/rtl-app.git, branch: master, date: August 1, 2017

2. Sadeghi's correspondence with USC regarding Li's and Pinscreen's public deception at SIGGRAPH RTL 2017 as well as USC's confirmation of TAC ¶ 93 in regards to Li's and Pinscreen's "misrepresentation," "falsification," and "research misconduct":

Iman Sadeghi <sadeghi@gmail.com> Mon, Dec 9, 2019 at 11:18 AM
To: [redacted]@usc.edu>

Dear [redacted]

The main repository related to Pinscreen's RTL 2017 presentation was stored at:
https://gitlab.com/pinscreen/rtl-app.git **TAC ¶ 93**

The stored code corresponding to August 1, 2017 in this repository demonstrates that the webcam avatar generation was fake:
"No matter who uses this version of the application to generate their own avatar from a webcam—as Pinscreen demonstrated—the pre-built avatar of Sadeghi will be displayed every time." (See Second Amended Complaint Paragraph 93) **TAC ¶ 93**

The commit history of this repository prior to to August 1, 2017 demonstrates that all supposedly autogenerated avatars presented during the demo were manually prepared by Pinscreen employees including Carrie Sun.

If the code that you received does not match this description, then you have received an inauthentic code.

Gitlab's legal department would be able to confirm the authenticity of the code that you have received.

I am available to answer further questions via email or phone.

Regards,
-Iman Sadeghi, PhD

[1] https://www.youtube.com/watch?v=hpuEdXn_M0Q&t=31m6s

[redacted]@usc.edu> Mon, Dec 9, 2019 at 11:30 AM
To: Iman Sadeghi <sadeghi@gmail.com>

Dear Dr. Sadeghi,

TAC ¶ 93

Thank you for getting back to me. We have done a full analysis of the code below, and it is as you described. Dr. Li's defense is the presentation was cashed in the event of internet connectivity issues. This would indicate (as suggested by a conference coordinator) that if there were an issue in this regard that the presenter could present a pre-cashed illustration or movie of the technology but also making it clear to alert the audience to this fact. As the presenter, it was obvious that there were no attempts by you to run a non-cashed code, nor did you inform the audience that you were presenting an illustration of the technology.

While it is obvious from the Skype conversations that the cashing of pre-constructed avatars and a false progress bar was premeditated, my question for you, as presenter, was there another code (besides the Gitlab code) that you had access to at that time that could successfully run in the event connectivity and band-with issues were no problem?

Thanks,

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I'm just trying to counter Li's argument that it is acceptable to present a non-realtime presentation based on problems with connectivity. That argument is moot if there was no test at SIGGRAPH for any connectivity problems. Either way, the presentation itself was misrepresented with no explanation to the audience. As presentation of a newly researched and developed computer science technology, that in-and-of itself is falsification and research misconduct. Verifying from you the presenter that the https://gitlab.com/pinscreen/rtl-app.git was the only code available at the time and the one you presented to the audience is a key piece of information. Also that you, as presenter, knew and admit that Pinscreen was knowingly misleading the audience (under Li's direction) by not informing them that the presentation was manually created and pre-recorded and not a RT demo, as was introduced by the moderator, Li and you at the time.

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Thank you.

TAC ¶ 93

Has Li already admitted that this code, containing prebuilt avatars, was what executed during the RTL presentation?

[redacted]@usc.edu> Mon, Dec 9, 2019 at 3:19 PM
To: Iman Sadeghi <sadeghi@gmail.com>

In so many words.

3. Defendants' denial of TAC ¶ 93 during discovery in contradiction with USC's findings:

PINSCREEN, INC.'S RESPONSE TO PLAINTIFF DR. IMAN SADEGHI'S AMENDED REQUESTS FOR ADMISSION, SET NO. 3

REQUEST FOR ADMISSION NO. 1 [CUMULATIVELY NO. 114]:

Admit that the software code that demonstrated Sadeghi's avatar generation using a webcam during Pinscreen's SIGGRAPH Real-Time Live presentation on August 1, 2017 was stored at: https://gitlab.com/pinscreen/rtl-app.git.

TAC ¶ 93

RESPONSE TO REQUEST FOR ADMISSION NO. 1 [CUMULATIVELY NO. 114]:

Defendant objects that this Request is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects that this Request seeks private, privileged, and confidential commercial, financial, and/or proprietary business information. Defendant further objects that this Request is vague and ambiguous, particularly as to the terms/phrases "Sadeghi's avatar generation using a webcam," and "stored," and that the reference to "the software code" is vague, ambiguous, overly broad, and non-specific. Defendant further objects that the Request is overly broad and nonspecific as to time period, particularly as to the phrase "was stored." Defendant further objects that this Request is compound in violation of C.C.P. § 2033.060(f). Plaintiff further objects that this request assumes facts not in evidence.

Subject to and without in any way waiving the foregoing objections, following a diligent and to the extent it understands this Request, Defendant responds as follows:

Deny.

REQUEST FOR ADMISSION NO. 2 [CUMULATIVELY NO. 115]:

Admit that Sadeghi's avatar that was demonstrated during Pinscreen's SIGGRAPH Real-Time Live presentation on August 1, 2017 was manually prepared.

RESPONSE TO REQUEST FOR ADMISSION NO. 2 [CUMULATIVELY NO. 115]:

Defendant objects that this Request is vague, ambiguous, and overly broad, particularly as to the terms/phrases "demonstrated" and "manually prepared." Defendant further objects that this Request seeks private, privileged, and confidential commercial, financial, and/or proprietary business information. Defendant further objects that this Request is compound in violation of C.C.P. § 2033.060(f).

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DEFENDANT PINSCREEN, INC.'S RESPONSE TO PLAINTIFF'S AMENDED REQUEST FOR ADMISSION, SET NO. 3

Subject to and without in any way waiving the foregoing objections, following a diligent and to the extent it understands "manually prepared" to mean "cached," Defendant responds as follows:

Pinscreen admits that Dr. Iman Sadeghi's avatar demonstrated by Dr. Sadeghi himself during Pinscreen's SIGGRAPH Real-Time Live presentation on August 1, 2017 was cached, and that the use of cached images was strongly encouraged by SIGGRAPH Real Time Live conference chairs to Pinscreen and, on information and belief, other presenters. Except as otherwise expressly admitted, denied.

REQUEST FOR ADMISSION NO. 3 [CUMULATIVELY NO. 116]:

Admit that no matter who uses the software that was used during Pinscreen's SIGGRAPH Real-Time Live presentation on August 1, 2017 to generate their avatar from a webcam, Sadeghi's avatar will be displayed.

TAC ¶ 93

RESPONSE TO TO REQUEST FOR ADMISSION NO. 3 [CUMULATIVELY NO. 116]:

Defendant objects that this Request is vague, ambiguous, and overly broad, particularly as to the terms/phrases "no matter who uses the software" and "the software," "uses"/"used" and "will be displayed" (future tense), rendering this Request unintelligible. Defendant further objects to the extent that this Request is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects that this Request seeks private, privileged, and confidential commercial, financial, and/or proprietary business information. Defendant further objects that this Request is compound in violation of C.C.P. § 2033.060(f).

Subject to and without in any way waiving the foregoing objections, following a diligent and to the extent it understands this Request, Defendant responds as follows:

Deny.

Dated: October 11, 2019

GRAYVER LAW GROUP, P.C.
LAW OFFICES OF BENJAMIN DAVIDSON, P.C.

By: _____
Leonard Grayver
Benjamin Davidson
Attorneys for Defendants

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